Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

Title V (draft permit) No. V-99-004 Rogers Group, Incorporated Hopkinsville, Kentucky 42240 Plant I.D. #072-0700-0060 Application Log # F808 March 1, 1999 Girish Kothari, Reviewer

Source Description, control equipment, & construction date

Rogers Group, Inc. produces asphalt. The plant consists of an Oil Fired Rotary Dryer (Batch Mix), Aggregate Handling, Stockpiles, a Tertiary Crusher, Conveyor Transfer Points, Receiving Hoppers, and a Paved and Unpaved Haul Road and Yard Area.

The aggregate handling, stockpiles, and a paved and unpaved haul road and yard area emissions are controlled by wet suppression. The rotary dryer emissions are controlled by a baghouse whose efficiency is 99.80%. The actual particulate emissions from the paved haul road were calculated at 90% efficiency while the emissions from unpaved haul road were calculated at 70% efficiency. The conveyors are fully enclosed and the fugitive particulate emissions were calculated at 90% efficiency..

The existing plant currently operates under the authority of operating permit S-98-072. Under the Regulation 401 KAR 50:032, Prohibitory rule for hot mix asphalt plants, the company is allowed to produce up to 360,000 tons of asphalt during any consecutive twelve (12) month period. However, in this permit application, the company has requested a revision to the existing permit S-98-072 to increase the annual asphalt production from 360,000 tons to 525,000 tons. Since the company has proposed to exceed the production limits contained in this regulation, the Potential to Emit (PTE) must be calculated at 8760 hours per year. The potential emissions of NOx and CO would thus be far in excess of major source levels. There are no applicable regulations for NOx and CO emissions since the source was constructed in the year 1971. Additionally, the annual asphalt production limit on the permit is not required.

The existing source was constructed in the year 1971. Therefore, Prevention of Significant Deterioration of Air Quality (PSD) regulation is not applicable, since the source was constructed prior to the effective date of this regulation.

Compliance with the Regulations 401 KAR 61:020, Existing process operations, and 401 KAR 63:010, Fugitive emissions, is expected. The source emissions were calculated using emission factors provided by the U.S. EPA in their latest proposal for revision to the AP-42 Manual.

Regulation 401 KAR 59:465 (40CFR60, Subpart I) does not apply since it only applies to sources commenced after June 11, 1973. Regulation 401 KAR 61:035, Existing process gas streams, does not apply to the sulfur dioxide emissions because Christian County is not a Class I or VA County for SO2. It does not apply for CO because the Potential To Emit (PTE) is less than 1000 tons per year and Christian County is attainment for CO.

Periodic Monitoring

The rotary dryer at this source is not subject to Regulation 401 KAR 59:465 (40 CFR 60, Subpart I), only to the process weight regulation; therefore, provisions for monitoring opacity are considered sufficient for periodic monitoring requirements. The opacity will be monitored qualitatively each day and the results recorded in a log. Annual monitoring using EPA Reference Method 9 is also required.

Credible Evidence:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.